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September 7, 2004

TO: Mr. Russell Hart, RPM
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

FROM: Mr. David Curnock, PM, SECOR International Incorporated

RE: MONTHLY PROGRESS REPORT/MEMORANDUM
Area 9/10 Remedial Design
Southeast Rockford Groundwater Contamination Superfund Site
Rockford, Illinois

Copies: Mr. Thomas Turner, Regional Counsel, USEPA Region V
Mr. Scott Moyer, Hamilton Sundstrand/United Technologies Corporation
Ms. Kathleen McFadden, United Technologies Corporation
Mr. Thomas Williams, PM, IEPA
Mr. Terry Ayers, IEPA

CURRENT MONTH PROJECT ISSUES/STATUS: (*activities, meetings, deliverables, etc.)*
Activities conducted in August 2004 consisted of continuing preparation of the Pilot Test Summary Report, data validation activities, and evaluation of other investigation information and results. Also, on August 10, 2004, a meeting was held with Hamilton Sundstrand, United States Environmental Protection Agency (USEPA), Illinois Environmental Protection Agency (IEPA), and SECOR International Incorporated (SECOR) personnel to present and discuss the preliminary results of the Pre-Design Investigation (PDI) and the appropriate next steps to be undertaken.

Results from the pilot testing [air-sparging/soil vapor extraction within the Outside Container Storage Area (OSA)] activities have been reduced and evaluated. The pilot test validates the remedy technology presented within Record of Decision as being the practical technology application given the geologic and hydrologic nature of the area. The Pilot Test Summary Report has been completed at this time and is currently undergoing final editing prior to production for submission. It is anticipated that this report will be sent out shortly.

The meeting held on August 10, 2004 was conducted at the SECOR office located in Lombard, Illinois. In attendance were Mr. Scott Moyer, Hamilton Sundstrand; Mr. Russell Hart, USEPA; Mr. David Curnock, SECOR; Mr. Thomas Williams, IEPA; and, a member of the IEPA's remedial contractor (Camp Dresser McKee). The purpose of the meeting was to present the USEPA and IEPA with results of the PDI efforts undertaken to this point and, based on these results, to discuss the appropriate next steps.

The PDI groundwater data indicate elevated concentrations of various compounds in newly installed monitoring wells SMW-6 and SMW-7 located south of the Hamilton Sundstrand facility on the southern adjoining properties (DRB Buildings and Rockford Products) and existing monitoring well MW201 located in the Rockford Products parking lot. This data, combined with groundwater flow direction, indicate the potential presence of a groundwater contamination source up-gradient of these wells. Groundwater flow information generated to date suggests that the groundwater in the vicinity of the Hamilton Sundstrand facility and the immediately surrounding properties flows in a west-southwesterly fashion.

Discussion of the appropriate next steps for this groundwater condition included the installation of additional monitoring wells up-gradient from these particular well locations (SMW-6, SMW-7 and MW201) to better define potential source areas.

The meeting also included a discussion of potential interim remedial actions associated with the (former) RCRA OSA. Following on historical discussions regarding the OSA, the alternative of "source removal" by direct excavation was examined as likely activity that would provide positive results.

The third topic of the meeting encompassed the on-going product (jet fuel) recovery in the eastern portion of the South Alley. More effective and efficient recovery equipment is to be tested and installed (based on testing).

A copy of the letter to Mr. Russell Hart, USEPA, regarding the August 10, 2004 meeting is attached to this memorandum.

FUTURE PROJECT ISSUES/STATUS: *(activities, meetings, deliverables, etc.)*
Future project activities for September 2004 will include the submission of the Pilot Test Summary Report. Also, in accordance with the August 10, 2004 meeting, initial efforts leading to the installation and sampling of the new monitoring wells will be undertaken.

SAMPLE/TEST DATA SUBMITTALS:
No sample/test data submittals are included with this memorandum.

RD SCHEDULE UPDATE: (*attach updated schedule as necessary*)
As the activities associated with the PDI portion of the Remedial Design continue, the overall schedule continues to be revised. Currently, the Pilot Test Summary Report is scheduled is be submitted to the USEPA in mid September 2004. Installation of additional investigatory wells is to be initiated in September 2004 also. Based on the citing and completion of these wells by the end of September, sampling and results should be available in early November 2004. These results may provide the appropriate information to move forward with a more focused, cost effective remedial design for this portion of Area 9/10.

Hamilton Sundstrand will continue to work with the USEPA on keeping the RD efforts for Area 9/10 moving forward in a timely and reasonable fashion.

REALIZED/ANTICIPATED PROBLEM CONDITIONS:
None.

PERSONNEL CHANGES:
None.

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September 2, 2004

Mr. Russell Hart
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Additional Work Proposal: August 10, 2004 Meeting Follow-up
Area 9/10, Remedial Design
Southeast Rockford Groundwater Contamination Superfund Site
Rockford, Illinois

Dear Mr. Hart:

This letter is a follow-up to the meeting on held on August 10, 2004, at the office of SECOR International Incorporated (SECOR), regarding the preliminary findings of the Pre-Design Investigation activities associated with Area 9/10 of the Southeast Rockford Groundwater Contamination Superfund Site (SER Site). Attending the meeting were Mr. Scott Moyer, Hamilton Sundstrand/United Technologies Corporation, Mr. Thomas Williams, Illinois Environmental Protection Agency (IEPA), Mr. David Curnock, SECOR, and you. Also in attendance was a member of the IEPA's remedial design contractor Camp Dresser McKee (CDM). The meeting was designed to provide the interested parties with a summary of the efforts that had been undertaken to date along with their results and a discussion of what these results mean to potential future activities.

The purpose of the Pre-Design Investigation (PDI) was to attempt to fill certain data gaps that were present moving into the Remedial Design (RD) phase for Area 9/10. The consensus of the interested parties (USEPA, Hamilton Sundstrand, and IEPA) was to perform the PDI and allow the data to drive the remainder of the RD process. The PDI results have not filled all of these data gaps. The PDI to this point has provided a significant body of additional information on the character of conditions present in the northeastern portion of Area 9/10. However, data gaps still remain which would impede or preclude the completion of a cost effective, efficient remedial design at this stage. Additional steps to be undertaken are designed to potentially eliminate these critical data gaps.

To this end, there were essentially three items regarding the body of information collected that were discussed in terms of filling data gaps and furthering the process towards the preparation of the remedial design. These three main items consisted of the following.

- The presence of elevated concentrations of volatile organic compounds (VOCs) in the groundwater samples collected from newly installed off-site monitoring wells SMW-6 and SMW-7 located south of the Hamilton Sundstrand facility.

- The presence of light non-aqueous phase liquid (LNAPL) in the two recovery wells located in the eastern portion of the South Alley on the Hamilton Sundstrand facility.

- The potential for source reduction in the former RCRA container storage area located on the northwest portion of the Hamilton Sundstrand facility by limited soil excavation and off-site disposal.

Each of these items will be further discussed in the following paragraphs.

Elevated VOCs: SMW-6 and SMW-7

The two monitoring wells SMW-6 and SMW-7 located south and off-site of the western portion of the Hamilton Sundstrand facility exhibited elevated concentrations of several VOCs. These wells were placed in areas where up to this point, no groundwater water data had previously been collected. These wells are located in the vicinity of MW-201 (Rockford Products parking lot) whose initial monitoring results (CDM, RI 1996) were the main driver for groundwater in Area 9/10.

In the interest of "source control" with respect to the third Record of Decision (ROD) and the efforts associated with remedial design being undertaken by Hamilton Sundstrand in Area 9/10, these new data indicate the potential presence of a source(s) at these locations or up-gradient thereof. However, these data alone do not provide adequate information with respect to the nature and location of this potential source(s). Therefore, by applying the west, southwest groundwater flow pattern in this vicinity and based on the VOC concentrations identified in SMW-6, SMW-7 and MW-201, Hamilton Sundstrand is proposing the installation of four additional water table (shallow) monitoring wells to attempt to determine the existence and potential location of a source(s) (see attached figure). Three of these monitoring wells are to be located in the western portion of the South Alley on the Hamilton Sundstrand facility in relative up-gradient positions from the three off-site wells (SMW-6, SMW-7 and MW-201) exhibiting the elevated VOC concentrations. One additional water table monitoring well will be located on the north side of the Hamilton Sundstrand facility in the North Alley in an approximate down-gradient position from the former Mid States facility. This northern up-gradient well location will act as control point to determine if there may be a component (significant or otherwise) of groundwater impacts emanating from the former Mid States property. These well locations should provide relevant information with respect to source materials potentially being present in these areas.

These monitoring wells will be installed and sampled following the same protocol as the other shallow monitoring wells for the PDI. Soil samples will be collected from the borings and analyzed for VOCs and diesel range petroleum organics (DRO) for the presence of jet fuel. Upon completion of the wells, they will be developed and surveyed for elevations. These four wells along with the three previously sampled wells (SMW-6, SMW-7 and MW-201) will be sampled for VOCs and DRO. The results of this effort will be provided upon completion of the sampling and receipt of the analyses from the laboratory.

It is the intention of Hamilton Sundstrand to complete these activities in such a time frame that the results will be included in the monthly progress memorandum due to the United States Environmental Protection Agency (USEPA) by November 5, 2004. Based on these results, the next appropriate actions will be presented/suggested, as well.

These additional PDI activities will be incorporated into the Data Evaluation and Summary Report which is in partial preparation. The report will not be issued until all of the PDI activities have been completed. The preliminary results presentation on August 10, 2004 was done so as to provide an information "bridge" between the initial portion of the PDI and these additional activities.

South Alley NAPL

The continued presence of NAPL in the South Alley (historical jet fuel release) addressed through a modification to the existing recovery system. Hamilton Sundstrand currently operates NAPL recovery pumps in the two wells where NAPL has been observed. These pumps have proven to be inefficient given the limited NAPL thickness present. Hamilton Sundstrand proposes to field test an

alternative NAPL recovery pump system which provides the sensitivity to lesser product thicknesses to enhance the current recovery process. Based on the performance of the field testing, the alternative recovery pumps will likely be deployed. The results of the field evaluation will be provided to the USEPA in the monthly progress report due by October 2004.

Soil Excavation Source Reduction

As part of the PDI, eight soil borings were advanced in the former RCRA outdoor container storage area (OSA). These borings were sampled on a continuous basis with samples being analyzed for VOCs, DRO and RCRA metals at two feet intervals. The results of these analyses indicate that the majority of the contaminant source is present in the upper six to eight feet of the soil. The removal of this soil in mass (excavation) would provide an efficient and effective method of source reduction. As well, this action would alleviate the majority of the concern regarding metals in soils, as the technology specified in the ROD (soil vapor extraction) would not be effective in remediating these compounds. Excavation of soil from the OSA for source control could be undertaken as an interim action resulting in a potential benefit on many levels. As was discussed, Hamilton Sundstrand is willing to embrace this concept of source reduction by means of direct excavation and would like to continue the dialog with the USEPA on the manner by which it could be accomplished.

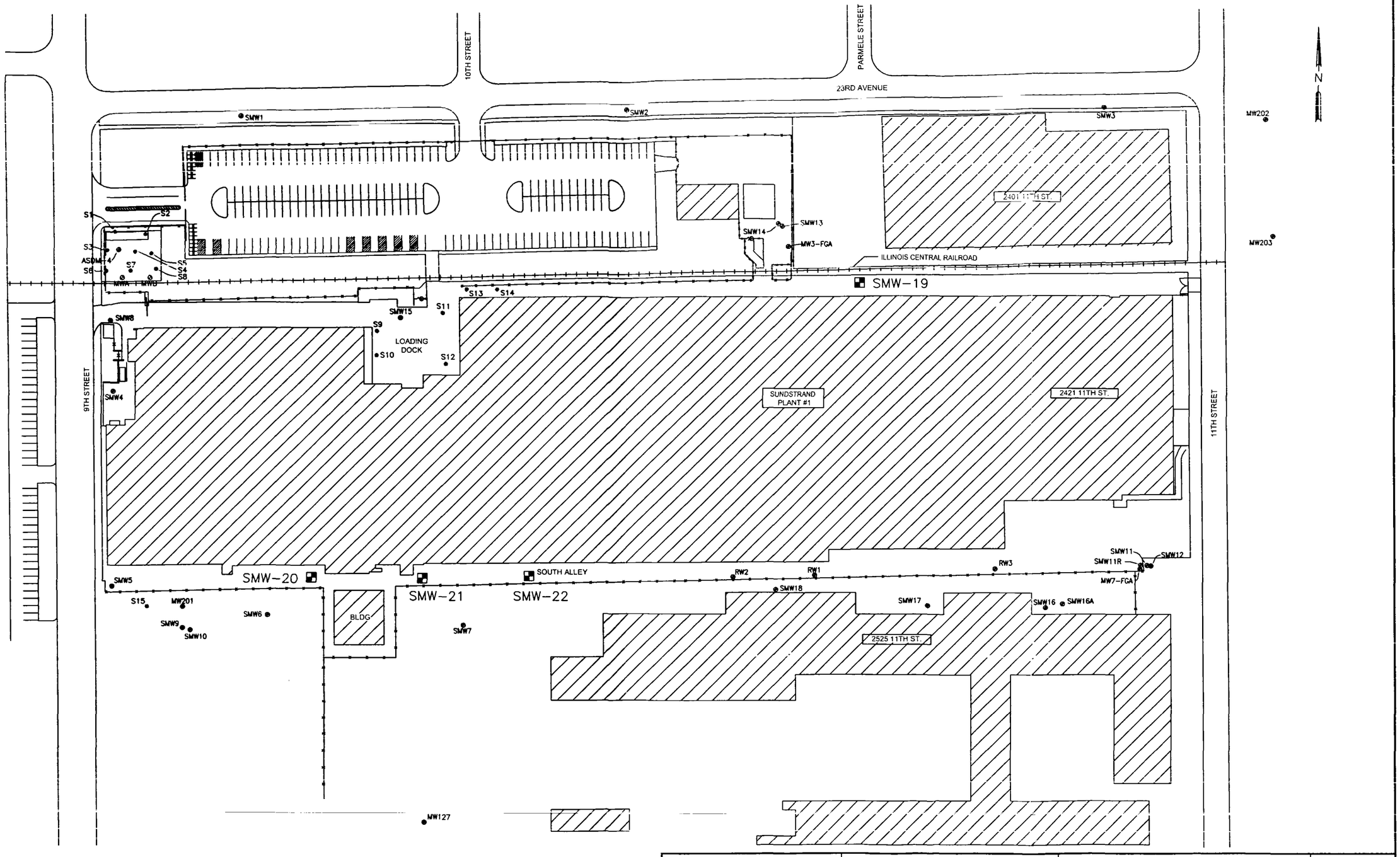
We appreciate the USEPA's cooperation and involvement in keeping the Area 9/10 Remedial Design effort moving on an appropriate course. As always, if you have any questions, please do not hesitate to call.

Sincerely,
SECOR International Incorporated

David M. Curnock
Principal Scientist

Attachment: Proposed Monitoring Well Locations

cc: Mr. Scott Moyer, HS/UTC
Ms. Kathleen McFadden, UTC
Mr. Brian Yeich, UTC
Mr. Thomas Turner, USEPA
Mr. Thomas Williams, IEPA
Mr. Terry Ayers, IEPA



LEGEND

■ PROPOSED MONITORING WELL

0 110 220

APPROXIMATE SCALE (FEET)

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PREPARED FOR:
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SE ROCKFORD
AREA 9/10 REMEDIAL DESIGN
ROCKFORD, ILLINOIS

PROPOSED MONITORING WELLS

FIGURE: **1**

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